

1 **STIP**

2 ADAM L. GILL, ESQ.
3 Nevada State Bar No. 11575
4 723 South 3rd Street
5 Las Vegas, NV 89101
6 P: (702) 750-1590
7 F: (702) 548-6884
8 Attorney for Defendant
9 Francisco Mares

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 vs.
15 FRANCISCO MARES,
16 Defendant,

17 Case No: 2:20-cr-00018-JCM-EJY-2

18 **STIPULATION TO CONTINUE
19 SENTENCING
(First Request)**

20 IT IS HEREBY STIPULATED AND AGREED, by and between Defendant
21 FRANCISCO MARES, by and through his counsel, ADAM L. GILL, ESQ. and the United States
22 of America, by its counsel, ALLISON REESE, ESQ., Assistant U.S. Attorney, that the
23 Sentencing in the above-captioned matter currently set for September 8, 2021 at 10:30 a.m. be
24 continued to at least 30 days.

25 This stipulation is entered for the following reasons:

26 1. Counsel needs more time to prepare sentencing mitigation materials.
27 2. Mr. Gill has spoken with Mr. Mares and he agrees with this continuance.
28 3. Mr. Gill has spoken to Ms. Reese and Ms. Reese has indicated that she has no
objection to this continuance.
4. Additionally, denial of this request for continuance could result in a miscarriage of
justice.
5. In addition, the continuance sought is not for delay and the ends of justice are in fact

1 served by the granting of such continuance which outweigh any interest of the public
2 and the defendant in proceeding with sentencing on September 8, 2021.

3 DATED this 18th day of August, 2021.

4
5 */s/ Adam L. Gill*
6 Adam L. Gill, Esq.
7 Counsel for Defendant
8 Francisco Mares

9
10 */s/ Allison Reese*
11 Allison Reese, Esq.
12 Attorney for the United States
13 Assistant United States Attorney

1 **FOF**
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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 Case No: 2:20-cr-00018-JCM-EJY-2

15 vs.

16 **ORDER**

17 FRANCISCO MARES

18 Defendant.

19 **FINDINGS OF FACT**

20 Based on the stipulation of Counsel, and good cause appearing, the Court finds that:

- 21 1. Counsel needs more time to prepare sentencing mitigation materials.
- 22 2. Mr. Gill has spoken with Mr. Mares and he agrees with this continuance.
- 23 3. Mr. Gill has spoken to Ms. Reese and Ms. Reese has indicated that she has no
24 objection to this continuance.
- 25 4. Additionally, denial of this request for continuance could result in a miscarriage of
26 justice.
- 27 5. In addition, the continuance sought is not for delay and the ends of justice are in fact
28 served by the granting of such continuance which outweigh any interest of the public
and the defendant in proceeding with sentencing on September 8, 2021.

ORDER

IT IS HEREBY ORDERED, that the Sentencing hearing, currently scheduled for September 8, 2021, at the hour of 10:30 a.m., be vacated and continued to October 27, 2021, at the hour of 11:00 a.m.

Dated : August 18, 2021.

James C. Mahan
UNITED STATES DISTRICT JUDGE